AO 91 (Rev. 11/11) Criminal Complaint (approved by AUSA LIVERMORE)

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America
v.
RICHARD WILSON

Defendant(s)

Case No. 17-767-M

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 1, 2017 in the county of Philadelphia in the Eastern District of Pennsylvania, the defendant(s) violated:

Code Section	*Offense Description*
18 U.S.C. § 1591	Sex Trafficking
18 U.S.C. § 2422	Coercion of Prostitution

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☑ Continued on the attached sheet.

Complainant's signature

FBI S/A Christopher Jackson

Printed name and title

Sworn to before me and signed in my presence.

Date: 6/2/2017

Judge's signature

City and state: Philadelphia, PA

HON. RICHARD A. LLORET, USMJ

Printed name and title

AFFIDAVIT

I, Christopher Jackson, being duly sworn, depose and state the following:

1. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI) and have been so employed for over one year. I am currently assigned to the Philadelphia Field Office, in particular to a squad responsible for investigating crimes committed against children, including but not limited to the sex trafficking of minors, in violation of Title 18, United States Code, Section 1591(a)(1). While employed by the FBI I have investigated federal criminal cases. I have gained experience through numerous hours of training at the FBI Academy, and through everyday work relating to conducting these types of investigations. I have participated in the execution of numerous search warrants for documents and other evidence, including computers and electronic media, in cases involving child pornography and the sexual exploitation of children.

2. I make this affidavit in support the of an application for a criminal complaint and arrest warrant charging RICHARD WILSON a/k/a "RICH DADDY" with violations of Title 18, United States Code, Sections 1591(a)(1) (sex trafficking) and 2422(b) (coercion of prostitution).

3. The information contained in this affidavit includes both information learned personally by me, as well as information provided to me by other witnesses and law enforcement officers in the course of the investigation. Because this affidavit is intended solely to demonstrate probable cause justifying the application for a criminal complaint and arrest warrant, the affidavit does not include all of the information known to me or to other law enforcement officers regarding the investigation.

PROBABLE CAUSE

4. The FBI is investigating a child sex trafficking organization believed to be led by Richard WILSON a/k/a "RICH DADDY." According to information provided by a victim

(hereinafter referred to as "Victim #1") WILSON arranges for females to work for him as prostitutes and takes a portion if not all of the proceeds earned in the course of commercial sex acts. WILSON generally posts advertisements offering commercial sex on Internet websites utilizing his cellular phone. When a sex trafficker (or "pimp") posts advertisements on the Internet, they usually do it by taking photographs of the sex workers in alluring poses. Victim #1 stated that she traveled to several different states while working in the commercial sex business for WILSON.

5. Victim #1 informed me that WILSON would routinely provide the females that worked for him cocaine and pills to keep them awake longer hours to perform more "dates". WILSON would take the females to various states to offer commercial sex acts. Based upon information provided by Victim #1 and another witness, WILSON has been known to utilize violence against the females forced to work for him.

6. On May 30, 2017, WILSON contacted a confidential informant (hereinafter known as "CI") after the CI posted a prostitution ad on Backpage.com. WILSON and the CI exchanged text messages during which he attempted to persuade the CI to participate in his sex trafficking organization. WILSON identified himself as a pimp and asked the CI to work for him. After the CI informed WILSON several times that she was 17 years of age, WILSON advised the CI that she should work for him and he knows how to help her earn money. WILSON requested to call the CI so they could discuss further plans. During the consensually recorded phone calls, WILSON explained that he does not split the money from dates, instead he keeps all proceeds. WILSON explained that he has been in this business a long time. WILSON informed the CI that he is looking

for a bottom,[1] someone he can depend on. WILSON advised that he knows areas where the CI can work for him where there is not a police presence. WILSON explained that he would not allow the CI to work in Northeast Philadelphia or areas surrounding the airport. The CI informed WILSON that she currently works for a female whom she met on a bus. WILSON asked the CI who posted her ads and what was the current split of her proceeds. WILSON informed the CI if they are going to work together, the CI would have to start saving up money. WILSON also told the CI that he will get the hotel rooms if she works for him. WILSON informed the CI he expects money upfront but would not disclose an amount.

7. On May 31, 2017, WILSON spoke with the CI by telephone and made arrangements to meet the CI in person to recruit her to work for him in his prostitution business.

8. On June 1, 2017, WILSON and the CI arranged a meeting at Chick-Fil-A restaurant, 805 Baltimore Pike, Springfield, Pennsylvania. WILSON arrived at the location at 8:48 p.m., a pursuit ensued and WILSON was taken into custody without incident by members of the FBI Child Exploitation Task Force. WILSON was immediately transported to the FBI Philadelphia Headquarters, 600 Arch Street Philadelphia, Pennsylvania for processing.

9. WILSON was read his Miranda rights, waived those rights, and was subsequently interviewed. During the interview, WILSON admitted that he has had females work for him in a prostitution capacity, including a female named "Niki" or "Sabrina" that operated as his "bottom". WILSON also admitted to have knowledge of Backpage.com (an internet escort site) and that he would routinely look through ads and try to recruit women as prostitutes.

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[1] Based upon my training and experience, I know that a "bottom," also referred to as a "bottom woman" or "bottom bitch," is a common slang term in the sex trafficking industry for the prostitute that a pimp puts in charge of the rest of his prostitutes.

CONCLUSION

10. Based on the above facts, I believe that there is probable cause to conclude that on or about June 1, 2017, in the Eastern District of Pennsylvania and elsewhere, RICHARD WILSON violated Title 18, United States Code, Sections 1591(a)(1) and 2422(b). Therefore, I request that the Court sign the Criminal Complaint and issue warrant for his arrest.

Christopher Jackson, Special Agent
Federal Bureau of Investigation

Sworn and subscribed
before me this 2nd day
of June 2017.

HON. RICHARD A. LLORET
United States Magistrate Judge